



Air Quality Permitting Statement of Basis

June 14, 2006

Tier I Operating Permit No. T1-050013

J.R. Simplot Co., Food Group, Caldwell

Facility ID No. 027-00009

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DRAFT FOR PUBLIC COMMENT

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Acronyms, Units, and Chemical Nomenclatures

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₃	ozone
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

Public Comment / Affected States / EPA Review Summary

A 30-day public comment period for the J.R. Simplot Co., Food Group draft Tier I operating permit will be held in accordance with IDAPA 58.01.01.364, Rules for the Control of Air Pollution in Idaho.

IDAPA 58.01.01.008.01 defines *affected states* as: “*All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within 50 miles of the Tier I source.*”

A review of the site location information included in the permit application indicates that the facility is located within 50 miles of a state border. Therefore, Oregon will be provided an opportunity to comment on the draft Tier I operating permit.

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

J. R. Simplot, Food Group, Caldwell facility (Simplot) produces pre-fried French fries, pre-formed and pre-fried potato products, and other processed potato products.

3. FACILITY / AREA CLASSIFICATION

This facility is not a major facility as defined by IDAPA 58.01.01.205 because its potential to emit is limited to less than 250 T/yr of a regulated NSR pollutant. The facility is not a designated facility as defined by IDAPA 58.01.01.006.27. The facility is classified as a major facility for Tier I operating permit requirements, in accordance with IDAPA 58.01.01.008.10, because it emits or has the potential to emit a regulated air pollutant above a Tier I operating permit major source threshold. The SIC code defining the facility is 2037, *Frozen Fruits, Fruits Juices and Vegetables*. The AIRS classification is "A."

The facility is located within AQCR 64 and UTM zone 11. The facility is located in Canyon County which is classified as unclassifiable for all criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone). There are no Class I areas within 10 km of the facility.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at Simplot. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

This permitting action involves the following:

- renewal of the facility's existing Tier I operating permit;
- replacement of Tier I Operating Permit No. T1-030015, issued June 21, 2004, the terms and conditions of which shall no longer apply;
- incorporates PTC No. P-050016, issued December 22, 2005, which superseded PTC No. 027-00009, issued December 31, 1997;
- incorporates PTC No. P-060025, issued June 14, 2006;
- removal of requirements pertaining to the Ethanol Production Plant and Ethanol Storage Tanks, which are inoperable;
- incorporation of ERC requirements pertaining to the Ethanol Production Plant and Ethanol Storage Tanks.

4.1 Application Chronology

April 4, 2005	DEQ received Tier I operating permit and PTC applications. Simplot requests PTC be included in Tier I operating permit renewal.
June 3, 2005	DEQ determined Tier I operating permit application complete.
December 22, 2005	DEQ issued final PTC.

April 3, 2006	DEQ received facility draft comments.
April 19, 2006	DEQ emailed requested changes to facility.
April 21, 2006	DEQ received additional facility draft comments.

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this permitting action.

5.1 *Regulatory Review*

This section describes the regulatory analysis of the applicable air quality rules with respect to this permit.

IDAPA 58.01.01.300.....Procedures and Requirements for Tier I Operating Permits

The facility is Tier I major facility with a current Tier I operating permit. The proposed project is renewal of the facility's Tier I operating permit.

IDAPA 58.01.01.369.....Tier I Operating Permit Renewal

This regulation stipulates the criteria and procedures for the renewal of a Tier I operating permit. The proposed project is significant modification of the current Tier I operating permit that meets the criteria specified within the regulation IDAPA 58.01.01.210, Demonstration of Preconstruction Compliance with Toxic Standards.

5.2 *Fee Review*

Simplot is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

6. PERMIT CONDITIONS

This section summarizes and explains the changes associated with the renewal of this Tier I operating permit.

All permit sections have been renumbered, and reformatted in order to update the permit format. Permit Sections 2 through 7 have been renumbered to Permit Sections 3 through 6. Existing Permit Section 7 - Ethanol Production Plant and Permit Section 8 – Ethanol Storage Tanks have not been included in this permit as those emission units are inoperable.

The facility-wide requirements section has been updated to incorporate the latest language pertaining to those permit conditions.

Former Section 2, Production Lines No. 1, 4, and 6, was changed to incorporate PTC No. P-050016, issued December 22, 2005, and has been renumbered to Permit Section 3. The section was changed because former Permit Section 2 referenced PTC No. 027-00009, issued December 31, 1997, which was superseded by PTC No. P-050016, issued December 22, 2005.

7. PERMIT REVIEW

7.1 *Public Comment*

A public comment period will be held in accordance with IDAPA 58.01.01.364, Rules for the Control of Air Pollution in Idaho.

8. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that Simplot be issued draft Tier 1 operating permit No. T1-050013. A public comment period will be held in accordance with IDAPA 58.01.01.364, Rules for the Control of Air Pollution in Idaho.

AC/bf Permit No. T1-050013

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